



Jamestown Police Department

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February 26, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW Room 222
Washington DC 20554

Dear Ms. Searcy:

RE: PR DOCKET NO. 92-235 OPPOSITION TO DOCKET

As an end user of public safety and/or special emergency frequencies I would like to voice my opposition to "spectrum refarming" as outlined in notice of proposed rule making #92-235. While public safety interests are unique from other spectrum users due to the public safety considerations, this distinction is not addressed in this proposal. Some major points of concern are listed below.

The possibility of having to replace existing equipment and expand the number of transmitter sites puts a tremendous fiscal burden on the governmental entities. These agencies cannot expect to bear this extra financial burden in this time of budget cutbacks.

Power limitations based on height above average terrain and fifty mile separations are not practical in public safety applications where a specific geopolitical area must be covered.

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Technical standards necessary to support this proposal do not address a cost effective method of modifying existing equipment. There is evidence of problems with poor voice quality, tone squelch decoding, data transmission, and tone sig-